

6.

The defendants provided a policy of short term and long term disability benefits naming petitioner as their insured under the policy of insurance.

7.

The petitioner was unable to return to work due to physical impairments and/or disabilities resulting from an automobile accident on November 18, 2016.

8.

The defendants denied petitioner's short term and long term disability benefits without just cause thereby breaching their contract with your petitioner entitling petitioner to monetary damages in an amount equal to the disability benefit payments past due and owing together with legal interest from date of judicial demand, attorney fees, and all court costs.

Wherefore, petitioner, **JULIA M. RANDLE, born WELBORN**, prays:

- I. There be citation and service of process on the defendants, **CIGNA HEALTH AND LIFE INSURANCE COMPANY**, and **LIFE INSURANCE COMPANY OF NORTH AMERICA** all in accordance with law.
- II. That after due proceedings are had a judgment be rendered in favor of petitioner, **JULIA M. RANDLE, born WELBORN**, and against the defendants, **CIGNA HEALTH AND LIFE INSURANCE COMPANY**, and **LIFE INSURANCE COMPANY OF NORTH AMERICA**, individually, jointly, and in solido, in a sum found reasonable in the premise, including but not limited to, a sum equal to all past due short and long term disability benefits owed to petitioner, together with legal interest from date of judicial demand, attorney fees, and all court costs be taxed and paid by the defendants.
- III. All other just and equitable relief that maybe granted in the premises.

Respectfully submitted,

STEVEN W. HALE & ASSOCIATES, INC.
A PROFESSIONAL LAW CORPORATION



STEVEN W. HALE, T.A. (Bar Roll No. 6425)
W. TAYLOR HALE (Bar Roll No. 31762)
1735 Ryan Street
Lake Charles, LA 70601
ph. (337) 433-0612
fax (337) 433-0613

**ATTORNEYS FOR PLAINTIFF
JULIA M. RANDLE, born WELBORN**

SERVICE INSTRUCTIONS

CIGNA HEALTH AND LIFE INSURANCE COMPANY

Through its agent for service of process
Honorable Tom Schedler
Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

LIFE INSURANCE COMPANY OF NORTH AMERICA

Through its agent for service of process
Honorable Tom Schedler
Louisiana Secretary of State
8585 Archives Ave.
Baton Rouge, LA 70809

A TRUE COPY
Lake Charles, Louisiana
Jean Vidrine
Deputy Clerk of Court
Calcasieu Parish, Louisiana
11-28-17

JULIA M. RANDLE
BORN WELBORN : 14TH JUDICIAL DISTRICT COURT

VS. No: 2017-47920 : PARISH OF CALCASIEU

CIGNA HEALTH AND LIFE
INSURANCE COMPANY,
LIFE INSURANCE COMPANY
OF NORTH AMERICA : STATE OF LOUISIANA

FILED: _____ : S/Kin Johnson
DEPUTY CLERK OF COURT

NOV 17 2017

**REQUEST FOR WRITTEN NOTICE OF ASSIGNMENT
AND/OR WRITTEN NOTICE OF ANY ORDER
OR JUDGMENT MADE OR RENDERED**

TO: Honorable H. Lynn Jones, II
Calcasieu Parish Clerk of Court
P. O. Box 1030
Lake Charles, LA 70602-1030

IN ACCORDANCE with **L.S.A.-C.C.P. art. 1572**, you are requested to give me, as counsel for plaintiffs in the above captioned matter, written notice by mail ten (10) days in advance of the date fixed for the trial or hearing of this case, whether on exceptions, motions, rules or the merits. I also request immediate notice of all orders or judgments, whether interlocutory or final, made or rendered in this case upon the rendition thereof, as provided by **L.S.A.-C.C.P. arts. 1913 and 1914**, including notice of judgment in the event this case be taken under advisement, or if the judgment is not signed at the conclusion of the trial.

Respectfully submitted,

STEVEN W. HALE & ASSOCIATES, INC.



STEVEN W. HALE (Bar Roll No. 6425)
W. TAYLOR HALE (Bar Roll No. 31762)
1735 Ryan Street
Lake Charles, LA 70601
Ph. (337) 433-0612
Fax (337) 433-0613
e-mail: taylor@halelawfirm.com
steven@halelawfirm.com

**ATTORNEYS FOR PLAINTIFF
JULIA M. RANDLE born WELBORN**

JULIA M RANDLE
VS. 2017-004792
CIGNA HEALTH & LIFE
INSURANCE COMPANY

Citation



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: CIGNA HEALTH AND LIFE
INSURANCE COMPANY
8585 ARCHIVES AVE.,
THRU/SOS
BATON ROUGE, LA 70809

FILED DEC 12 2017
Joseph L. Joyner
Deputy Clerk of Court
Calcasieu Parish, Louisiana

DEC 12 2017

Parish of East Baton Rouge, Louisiana, Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand contained in the petition of JULIA M WELBORN RANDLE, BORN WELBORN (PETITION FOR BREACH OF CONTRACT) against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within fifteen (15) days after the service hereof, under penalty of default.

Witness the Honorable Judges of said Court, at Lake Charles, Louisiana, this 17th day of November 2017.

Issued and delivered November 28, 2017

Joan Vickine
Joan Vickine
Deputy Clerk of Court

SERVICE INFORMATION

Received on the _____ day of _____, 20____, and on the _____ day of _____, 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____, 20____

SERVICE \$ _____

BY: _____

Deputy Sheriff

MILEAGE \$ _____

TOTAL \$ _____

Party No. P001

SCANNED
DEC 19 2017

I made service on the named party through the
Office of the Secretary of State on

DEC 05 2017

by tendering a copy of this document to

KATHY SUMMERS

Case #0283

Deputy Sheriff, Parish of East Baton Rouge, Louisiana
01/04/2018
in/au



Filing Date: 1/3/2018 12:00 AM

Case Number: 20173004792

Document Name: IMAGING

Page Count: 1

State of Louisiana
Secretary of State

12/06/2017

Legal Services Section
P.O. Box 94125, Baton Rouge, LA 70804-9125
(225) 922-0415

LIFE INSURANCE COMPANY OF NORTH AMERICA
C/O CIGNA CORPORATION
MR. MICHAEL A. JAMES, ESQUIRE
1601 CHESTNUT STREET, TWO LIBERTY PLACE
PHILADELPHIA, PA 19192

Suit No.: 20174792
14TH JUDICIAL DISTRICT COURT
CALCASIEU PARISH

JULIA M. RANDLE, ET AL
vs
CIGNA HEALTH & LIFE INSURANCE COMPANY, ET AL

Dear Sir/Madam:

I am enclosing citation served in regard to the above entitled proceeding. Please call the attorney that filed this document if you have any questions regarding this proceeding. If you received this document in error, please return it to the above address with a letter of explanation.

Yours very truly,

TOM SCHEDLER
Secretary of State

Served on: TOM SCHEDLER
Served by: B JAMES

Date: 12/05/2017
Title: DEPUTY SHERIFF

No: 1060626

KC



JULIA M RANDLE
VS. 2017-004792
CIGNA HEALTH & LIFE
INSURANCE COMPANY



14th Judicial District Court
State of Louisiana
Parish of Calcasieu

THE STATE OF LOUISIANA

TO: LIFE INSURANCE COMPANY OF
NORTH AMERICA
THROUGH ITS AGENT FOR
SERVICE OF PROCESS:
HONORABLE TOM SCHEDLER
LOUISIANA SECRETARY OF STATE
8585 ARCHIVES AVENUE
Baton Rouge, LA 70809

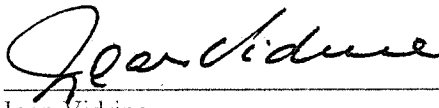
SERVED ON
TOM SCHEDLER
DEC 05 2017
SECRETARY OF STATE
COMMERCIAL DIVISION

Parish of East Baton Rouge, Louisiana, Defendant in said suit:

YOU ARE HEREBY CITED TO APPEAR before said Court, for said Parish, and to comply with the demand contained in the petition of JULIA M WELBORN RANDLE, BORN WELBORN (PETITION FOR BREACH OF CONTRACT) against you, certified copy of which petition accompanies this citation, or file your answers thereto in writing in the office of the Clerk of Court, at the Courthouse, in the City of Lake Charles, in said Parish, within fifteen (15) days after the service hereof, under penalty of default.

Witness the Honorable Judges of said Court, at Lake Charles, Louisiana, this 17th day of November 2017.

Issued and delivered November 28, 2017



Joan Vidrine
Deputy Clerk of Court

SERVICE INFORMATION

Received on the _____ day of _____ 20____, and on the _____ day of _____ 20____, served the above named party as follows:

PERSONAL SERVICE on the party herein named _____

DOMICILIARY SERVICE on the party herein named by leaving the same at his domicile in the parish in the hands of _____, a person apparently over the age of seventeen years, living and residing in said domicile and whose name and other facts connected with this service, I learned by interrogating the said person, said party herein being absent from his residence at the time of said service.

RETURNED:

PARISH OF _____ this _____ day of _____ 20____

SERVICE \$ _____

BY: _____
Deputy Sheriff

MILEAGE \$ _____

TOTAL \$ _____

Party No. P001



C M S 5 8 5 6 5 8 7
Filing Date: 11/28/2017 01:29 PM Page Count: 1
Case Number: 2017-004792
Document Name: Citation